

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

TRACY L. HAGEN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FIRSTSOURCE FINANCIAL	)	Case No. 3:11cv359
SOLUTIONS, LLC, JOHN D. KRISOR,	)	
JR., AND DOES 1 THROUGH 10,	)	
	)	
Defendants.	)	

**DEFENDANT'S MOTION FOR ENLARGEMENT OF TIME TO  
ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant, John D. Krisor, Jr., by counsel, requests that the Court enlarge the time for Defendant to file an answer or other responsive pleading to Plaintiff's Complaint for an additional 30 days, up to and including October 25, 2011. In support of this motion, Defendant states:

1. On September 6, 2011, Plaintiff filed a complaint against Defendant.
2. Counsel for Defendant is still in the process of investigating Plaintiff's claims in order to prepare an answer, and therefore requests additional time to respond to Plaintiff's Complaint, up to and including October 25, 2011.
4. Counsel for Defendant attempted to contact Plaintiff via telephone to obtain her position on this Motion, but was unable to reach Plaintiff prior to the filing of this Motion, despite a good faith attempt.
5. This Motion is made in good faith and is not intended to hinder or delay the prosecution of this matter.

WHEREFORE, Defendant requests that the Court enlarge the time for Defendant to file an answer or other responsive pleading, to and including October 25, 2011.

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

By: s/ Todd J. Kaiser  
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Attorneys for Defendant John D. Krisor, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on September 26, 2011, a copy of the foregoing was filed electronically. I hereby certify that on September 26, 2011, copy of the foregoing was mailed, by first class mail, postage prepaid and properly addressed to the following:

Tracy L. Hagen  
64645 CR 15  
Goshen, IN 46526

s/ Todd J. Kaiser

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